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September 25, 2017

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Communication –*Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3700-4200 Band,* RM-11791

Dear Ms. Dortch:

On September 22, 2017, Kara Azocar, Regulatory Counsel, Federal Affairs, of General Communication, Inc. ("GCI"), along with Jessica Gyllstrom and Carolyn Mahoney of Telecommunications Law Professionals PLLC, met with Blaise Scinto, Peter Daronco, Nese Guendelsberger, and Paul Powell of the Wireless Telecommunications Bureau ("WTB"). Matthew Pearl of WTB also participated via teleconference. The parties discussed the above-referenced docket, and GCI's presentation was consistent with its previous statements on the record.

During the meeting, GCI discussed the importance of continued unencumbered access to the 3700-4200 MHz band ("3.7 GHz Band" or "C-Band") for the provision of critical communications services throughout Alaska. GCI explained that as Alaska's largest communication provider, GCI must utilize a variety of technologies to overcome the natural challenges of operating in Alaska, including its remoteness, federal land restrictions, limited backhaul availability, and extreme weather conditions. As a result, GCI has invested well over $100 million in developing and deploying the C-Band in order to provide fixed satellite service ("FSS") backhaul operations and improve service availability for rural Alaskan customers that oftentimes do not have any other communications option. For background information, GCI shared a copy of the attached map depicting its C-Band sites with WTB staff. GCI also provided background information on the following critical services that it provides across all 500 MHz of the C-Band:

- Alaska Plan: To meet its obligations under the Alaska Plan, GCI uses C-Band spectrum to deliver middle-mile capacity for the last-mile LTE service – a critical initiative to provide needed broadband services to under- and otherwise entirely un-served areas.

- Critical Long-Distance Services: GCI provides Measured Toll Service ("MTS"), which is oftentimes the only communications link for remote villages throughout the state due to geographical and weather-related challenges unique to Alaska. GCI also relies on the C-Band to provide special access to businesses, Tribes, local, state and federal governments.

- Telehealth: Through its ConnectMD network, GCI supports the delivery of telemedicine services such as teleradiology, remote patient monitoring, medical network solutions, and live video-conferencing to customers in Alaska. In many instances, the ConnectMD network is the only way that rural Alaskans may gain access to comprehensive medical care.

- Long-Distance Learning: GCI's SchoolAccess network provides broadband access, video conferencing and state-of-the-art digital tools to schools and libraries in rural and underserved regions of the United States, allowing students to virtually participate in programs that may not otherwise be available due to their location.

- FAA Real-Time Weather Assistance: For over a decade, GCI has been working with the FAA on a program that provides real-time weather-camera information to pilots using the GCI satellite network for middle-mile backhaul. This program has reduced weather-related aviation incidents in Alaska by 85 percent, and has reduced how often pilots must turn a plane around due to weather by 66 percent.

GCI stressed that the above services depend on unfettered access to the C-Band that is free from interference. To that end, GCI expressed significant concern over the proposals offered in the BAC Petition. GCI explained that the proposal to eliminate or change full-band, full-arc coordination policies would strip FSS operators of the necessary flexibility to shift frequencies and satellites in the event of a transponder or satellite failure, thus interfering with GCI's operations and resulting in outages of what may be a consumers' only means of connectivity. GCI also noted that frequency coordination would not be a suitable method to resolving interference and explained that due to the configuration of the band and GCI's uses, any interference would be considered harmful interference and would result in the disruption of GCI's critical C-Band services.

Accordingly, GCI urged WTB staff to reject the BAC proposal and focus on the recent mid-band spectrum inquiry in order to develop a complete record and understanding of incumbent uses and need for unfettered access to this spectrum.

Sincerely,

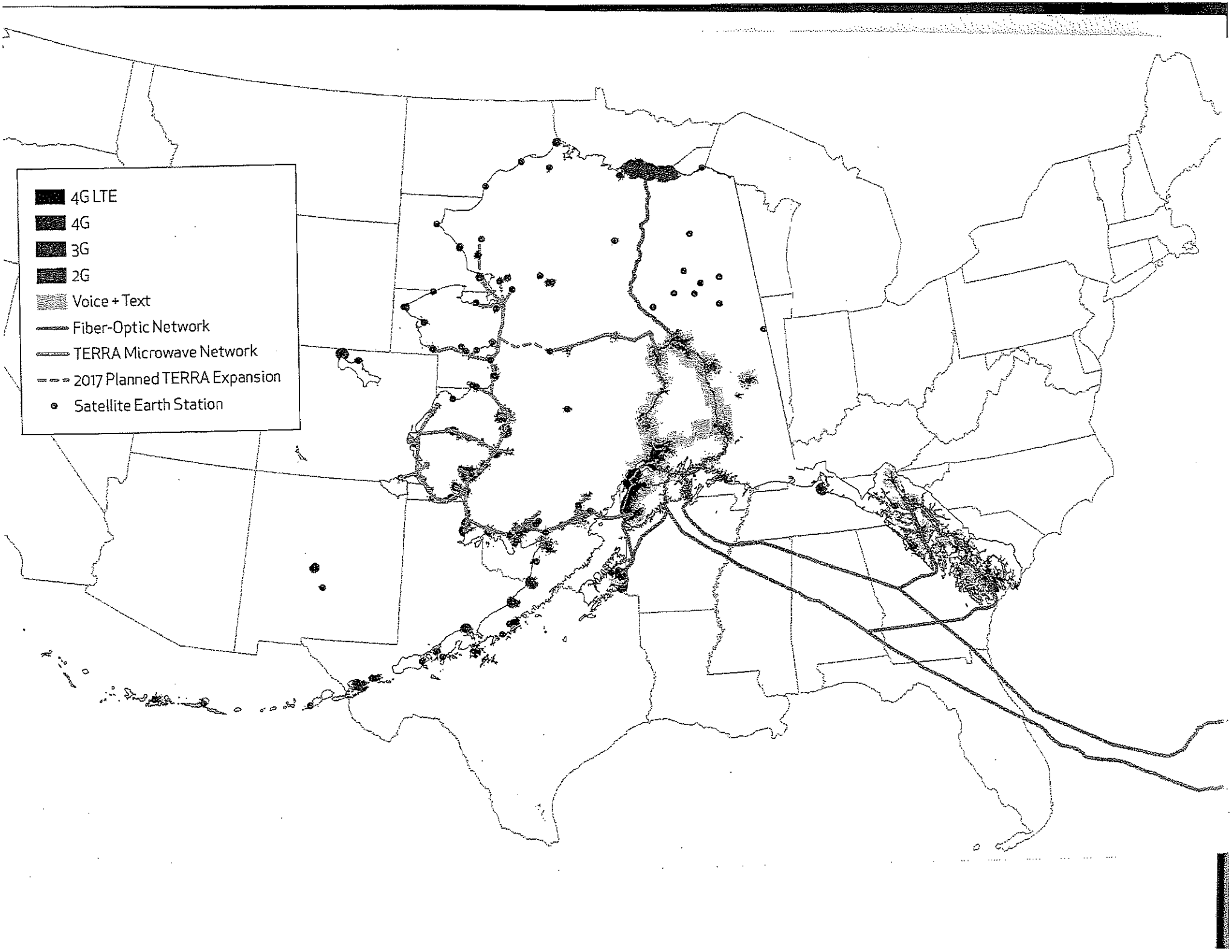
/s/ Jessica DeSimone Gyllstrom

Jessica DeSimone Gyllstrom
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Blaise Scinto
Peter Daronco
Nese Guendelsberger
Paul Powell
Matthew Pearl

Attachment

ATTACHMENT


4G LTE
4G
3G
2G
Voice + Text
Fiber-Optic Network
TERRA Microwave Network
2017 Planned TERRA Expansion
Satellite Earth Station